

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

SEAN COMBS,

Defendant.

24-cr-542 (AS)

**NOTICE OF MOTION TO EXCLUDE RULE 413 AND 404(b) EVIDENCE**

PLEASE TAKE NOTICE THAT, upon the Declaration of Teny Geragos, Esq., dated March 19, 2025, the exhibits attached thereto, and the accompanying Memorandum of Law, defendant Sean Combs, by and through his undersigned attorneys, will move this Court at the United States Courthouse, 500 Pearl Street, New York, N.Y., 10007 at a date and time to be determined by the Court, for an Order excluding the government's proffered Rule 413 and 404(b) evidence, or, in the alternative, for a hearing pursuant to Rule 104, or any other relief the Court deems appropriate.

Date: March 19, 2025

Respectfully Submitted,

/s/ Alexandra A.E. Shapiro  
Alexandra A.E. Shapiro  
Jason A. Driscoll  
SHAPIRO ARATO BACH LLP  
1140 Ave of the Americas, 17th Fl.  
New York, NY 10036  
(212) 257-4881  
ashapiro@shapiroarato.com  
jdriscoll@shapiroarato.com

Marc Agnifilo  
Teny Geragos  
AGNIFILO INTRATER  
445 Park Ave., 7th Fl.

New York, NY 10022  
646-205-4350  
[marc@agilawgroup.com](mailto:marc@agilawgroup.com)  
[teny@agilawgroup.com](mailto:teny@agilawgroup.com)

Anna Estevao  
SHER TREMONTE LLP  
90 Broad St., 23rd Fl.  
New York, NY 10004  
(212) 202-2600  
[aestevao@shertremonte.com](mailto:aestevao@shertremonte.com)